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ODP-82-226

18 FEB 1982

MEMORANDUM FOR: Chief, Regulations Control Division, OIS

FROM:

[REDACTED]
Chief, Management Staff, ODP

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SUBJECT:

Proposed [REDACTED] Policy and Procedures for
Management of Information Handling Systems
(Job #9710)

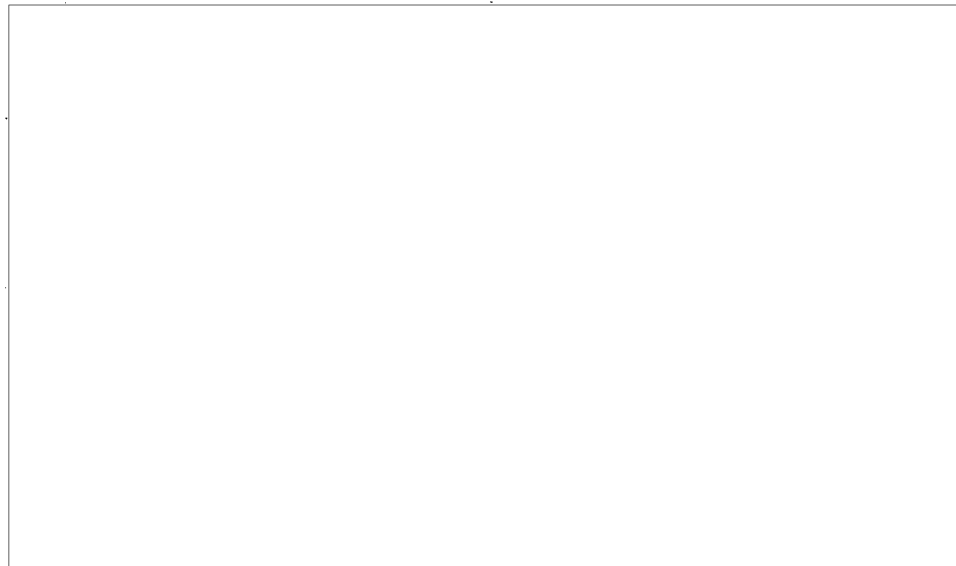
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1. The Office of Data Processing has reviewed the subject proposed Headquarters Notice and we are in general agreement with its objectives. We are, however, quite concerned that the significant management burden it implies will ultimately prove counter-productive. A prolonged series of reviews for relatively modest programs places an unwise and improper burden on senior Agency management and working-level technical personnel. Streamlined and decentralized management procedures are one of the key strengths of this Agency and these should not be vitiated without a compelling rationale. In this spirit, we propose that the dollar thresholds in [REDACTED] be significantly raised. This will place decision making at the most cost-effective level.

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2. We suggest that the following modifications be made to the proposed HN, paragraphs 3b(1) and (2):

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We believe these ceilings are far more realistic and provide office directors with an appropriate level of authority and responsibility. We also note that reviews of programs below the thresholds will and should still take place but without the formality and enormous overhead costs implied in the procedure of this Notice.

3. We also wish to underline our previous proposal that the second sentence of paragraph 2 be eliminated in its entirety. The focus of the HN should be exclusively systems and not hardware, such as terminals, printers and copiers. The latter should be excluded from the scope of this Notice unless the equipment has significant architectural implications. Management of hardware acquisitions is adequately covered in existing regulations, such as [redacted] ADP Management and Administration. STAT

4. Finally, two other sections of the Notice give us cause for concern. Paragraph 3c, last sentence, requires notification of the IHSA when a cost or schedule goal deviation of greater than 10 percent occurs in a program. We believe that this is below the level of resolution in most cases and the appropriate number should be 20 percent. Similarly, in paragraph 4a, the requirement (next-to-last sentence) for notification of the IHSA six months prior to Milestone 1 or 2 review of Class I or II systems is totally unrealistic. We believe that two (2) month notification is more than sufficient.

5. Thank you for your careful consideration of these comments. We believe that this particular Notice will have a major impact on the vital ADP programs of this Agency. A regulation with too broad a scope and with unreasonable management overhead is clearly not in the best interest of these programs, nor the overburdened Agency reviewing officials, and program and technical personnel responsible for their management. STAT

cc: IHSA

[redacted]

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